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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA  
ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON  
BELLWETHER SCHOOL DISTRICT  
SEARCH TERMS**

This Document Relates To:

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

*Baltimore County Board of Education  
v. Meta, et al., Case No. 24-cv-01561*

*Board of Education Harford County v.  
Meta, et al., Case No. 23-cv-03065*

*Board of Education of Jordan School  
District v. Meta, et al., Case No. 24-cv-  
01377*

*Breathitt County Board of Education v.  
Meta, et al., Case No. 23-cv-01804*

*Charleston County School District v.  
Meta, et al., Case No. 23-cv-04659*

*Dekalb County School District v. Meta,  
et al., Case No. 23-cv-05733*

*Irvington Public Schools v. Meta, et al.,  
Case No. 23-cv-01467*

*Saint Charles Parish Public Schools v.  
Meta, et al., Case No. 24-cv-01098*

*School District of the Chathams v.  
Meta, et al., Case No. 23-cv-01466*

*Spartanburg 6 School District v. Meta,  
et al., Case No. 24-cv-00106*

*The School Board of Hillsborough  
County, Florida v. Meta, et al., Case  
No. 24-cv-01573*

*Tucson Unified School District v. Meta,  
et al., Case No. 24-cv-01382*

1 Pursuant to the Discovery Management Order No.10 (Dkt. 1157), as extended by  
2 stipulation and order entered on September 19, 2024 (Dkt. 1163), the Bellwether School District  
3 Plaintiffs ("SD Plaintiffs") and Defendants (collectively, "the Parties") jointly submit this status  
4 report on search term negotiations and Plaintiffs' obligations under the Family Educational Rights  
5 and Privacy Act ("FERPA").

6 Consistent with the Court's instruction, the Parties continue to meet and confer regarding  
7 search terms and have made substantial progress toward narrowing and eliminating disputes,  
8 including mutually agreeing to the use of responsiveness sampling for specific key search terms.  
9 With respect to Plaintiffs' obligations under FERPA, the Parties have exchanged drafts and are  
10 continuing to negotiate a joint stipulation and proposed modification to the Stipulated Second  
11 Modified Protective Order (Dkt. No. 665). The Parties agree that additional time is necessary to  
12 finalize the parties' negotiations, and will continue to meet and confer regarding search terms and  
13 FERPA.

14 With the Court's permission and unless the Court directs otherwise, the Parties will  
15 provide a Supplemental Status Report to the Court on October 2, 2024. Should the Parties be  
16 unable to reach resolution by October 2, the Parties will include their proposed schedule for letter  
17 briefing on the remaining disputes in the October 2 submission. SD Plaintiffs reserve their right  
18 to seek a commensurate extension of time to the November 5, 2024, substantial completion of  
19 document production for those documents that hit on any additional terms.  
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1 DATED: September 25, 2024

Respectfully submitted,

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**ATTESTATION**

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 25, 2024

By: /s/Lexi J. Hazam

Lexi J. Hazam